

11/10/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
PUBLIC SERVICE COMPANY OF)
NEW HAMPSHIRE, et al.)
(Seabrook Station, Units 1 and 2))

Docket Nos. 50-443 OL
50-444 OL

NRC STAFF'S INTERROGATORIES AND REQUESTS FOR
DOCUMENT PRODUCTION TO THE STATE OF NEW HAMPSHIRE

NRC Staff hereby requests that the State of New Hampshire, pursuant to 10 C.F.R. §§ 2.740b and 2.741, answer separately and fully, in writing under oath or affirmation, the following interrogatories and produce and permit inspection and copying of the original or best copy of all documents identified in the responses to interrogatories below, and that subsequent to filing answers to these interrogatories and producing documents therein identified, New Hampshire file supplemental responses and produce additional documents as required by 10 C.F.R. § 2.740(e).

Where identification of a document is requested, briefly describe the document (e.g., book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and publisher, addressee, date written or approved, and the name and address of the person(s) having possession of the document.

DESIGNATED ORIGINAL

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As used in these discovery requests the term "document(s)" includes publications of any format, letters, memoranda, notes, reports, analyses, test results or data, recordings, transcriptions and printed, typed or written materials of every kind.

I. INTERROGATORY I

For each contention listed in the Specific Interrogatories contained herein (New Hampshire Contentions 9, 10, 13, 20 and 21), state the following information separately for each contention:

Q.I(1) Upon what person or persons do you rely to substantiate in whole or in part the view(s) as stated in this contention?

Q.I(2) Provide the addresses and education and professional qualifications of any person(s) named in response to the above interrogatory.

Q.I(3) Identify any person(s) you may call as a witness or witnesses on this contention.

Q.I(4) Provide summaries of the views, positions, or proposed testimony on this contention of all persons named in response to interrogatories (1) and (3) immediately above that you may present during this proceeding.

Q.I(5) State the specific bases and references to any documents upon which the persons named in Interrogatories 1 and 3 immediately above may rely or reference regarding this contention.

Q.I(6) List all documentary or other materials that you may use during this proceeding to support this contention or refer to during examination of witnesses. The list should be by author, title, date of

publication (if applicable), and publisher (if applicable). In addition to listing such documents, provide a copy of all documents (except for those that are NRC documents or documents provided to the NRC in this proceeding, which need only be listed). If you are uncertain as to whether a document was provided to the NRC, provide that document.

II. SPECIFIC INTERROGATORIES

CONTENTION 9

Radioactive monitoring

The Seabrook design does not provide an adequate program for monitoring the release of radioactivity to the plant and its environs either under normal operating conditions or in pre- and post-accident circumstances. Thus, the application is not in compliance with general design criteria 63, 64 of Appendix A, 10 C.F.R. Part 50, and the requirements of NUREG-0737 and NUREG-0800.

Q.9(a) Specify in detail: (1) the equipment, components, and procedures of the Seabrook in-plant monitoring system that you allege are not in compliance with GDC Nos. 63 and 64 of 10 C.F.R. Part 50, Appendix A, or the requirements of NUREG-0737; (2) the precise requirements of GDC 63, GDC 64 and Appendix A that are alleged to have not been met; (3) the reasons for asserting non-compliance for each GDC or Appendix A; and (4) the means by which you believe these alleged deficiencies can be cured.

9(b) Are you alleging that there is a lack of adequate monitoring capacity in terms of the range of monitoring equipment and the location

and number of monitoring sites? If so, explain in detail the bases for this assertion and describe what you believe should be done to correct any shortcomings.

9(c) Do you assert that radiation monitoring for radioactivity which may be released due to anticipated operational occurrences at Seabrook is inadequate to protect the public health and safety? If so, explain the reasons for this assertion and the means by which you feel any shortcoming can be corrected.

9(d) Provide and discuss in detail your reasons for asserting that the Applicants will not provide sufficient radiation monitoring capacity in containment spaces which could contain LOCA fluids, effluent discharge paths, and plant environs as required by General Design Criterion 64.

9(e) Are you asserting that the health physics division at the plant is not qualified or properly staffed to perform its function? If so, provide in detail the bases for such assertion. Include in your response a discussion of the provisions of Regulatory Guide 1.97 assertedly not being met by the Seabrook Applicants.

CONTENTION 10

Control Room Design

The Seabrook Station Control Room Design does not comply with General Design Criteria 19 through 22 and 10 C.F.R. Part 50, Appendix A, and NUREG-0737, Items I.D.1 and I.D.2.

Q.10(a) Specify in detail the equipment, design features, or other components of the Seabrook Station Control Room Design that you contend

do not comply with General Design Criteria 19-22 and 10 C.F.R. Part 50, Appendix A, and NUREG-0737, Items I.D.1 and I.D.2.

10(b) For each noncompliance identified in your response to 10(a), describe in detail: (1) the specific regulatory requirement(s) allegedly not satisfied; (2) the technical reasons and bases for the assertion of the alleged noncompliance with NRC requirements; and (3) the means, in your views, by which these shortcomings should be corrected.

10(c) Do you assert that an adequate Detailed Control Room Design Review ("DCRDR") will not be conducted? If so, provide in detail the bases for your assertion and describe what you consider to be the proper method of conducting a DCRDR. Compare your answer with existing NRC requirements.

10(d) Do you assert that human factors have not been properly considered in the design of the Seabrook control room? If so, provide the detailed reasons for your assertion and describe how you believe human factors should be considered. Compare your answer with existing NRC requirements.

10(e) Provide the basis for the assertion on page 27 of your April 5 contentions that Applicants "must provide a system which meets the specifications of Regulatory Guide 1.47."

10(f) State: (1) how the Applicant fails to meet the provisions of Reg. Guide 1.47; (2) the technical bases and reasons for these alleged shortcomings; and (3) how these shortcomings should, in your view be corrected.

10(g) Do you contend that the Seabrook facility will lack the capability to promptly place the reactor in hot shutdown or subsequently

place the reactor in cold shutdown through the use of equipment located outside the control room as required by General Design Criteria 19? If so, provide in detail the reasons for your assertion. Include in your response specific references to the design of the Seabrook facility.

CONTENTION 13

Operation Personnel Qualifications

The Applicant has not demonstrated that the following operations personnel are qualified and properly trained in accordance with NUREG-0737, Items I.A.1.1, I.A.2.1, I.A.2.3, II.B.4, I.C.1, and Appendix C:

- a. Station Manager
- b. Assistance Station Manager
- c. Senior Reactor Operators
- d. Reactor Operators; and
- e. Shift Technical Advisors.

Q.13(a) State in detail the bases for your assertion that the listed employees are not adequately trained. Include in your response the specific reasons you feel that the Applicant's training program will be inadequate.

13(b) For each category of personnel listed, state the regulatory or other criteria by which that category's training should be tested and the steps that New Hampshire believes the Applicant must take to satisfy these criteria. In particular, discuss the aspects of NUREG-0737 that have not been met and that you believe must or should be met by each personnel category in the contention.

13(c) Do you assert that the training center staff will not provide proper instruction to reactor operators in technical engineering topics? If so, provide the reasons for your assertion.

13(d) Besides the NRC letter mentioned in the Basis to Contention 13, specify in detail any other reasons, if any, you have to believe that the

Applicant will be unable to develop a training program to teach the proper responses to accidents in which the core is damaged.

CONTENTION 20

The accident at Three-Mile Island demonstrated the inability of all parties involved to comprehend the nature of the accident as it unfolded; communicate the necessary information to one another, to the Federal, State, and local governments, and to the public in an accurate and timely fashion; and to decide in a timely manner what course to take to protect the health and safety of the public. The Applicant in these proceedings has not adequately demonstrated that it has developed and will be able to implement procedures necessary to assess the impact of an accident, classify it properly, and notify adequately its own personnel, the affected government bodies, and the public, all of which is required under 10 C.F.R. 50.47 and Appendix E, and NUREG-0654.

Q.20(a) List and describe in detail each provision of the Applicant's emergency plan which you believe violates provisions of either 10 C.F.R. 50.47, 10 C.F.R. Part 50, Appendix E, or NUREG-0654.

20(b) State the precise provisions of 10 C.F.R. 50.47 and Appendix E and NUREG-0654 that each of the emergency plan shortcomings listed in the answer to question 20(a) violates and describe how these deficiencies should be corrected.

20(c) Describe in detail how the emergency classification and action scheme outlined in Section 9 of the Applicant's Emergency plan is inadequate and state the steps that New Hampshire believes must be taken for it to satisfy the requirements of 10 C.F.R. 50.47(b)(4) and NUREG-0654, App. 1.

20(d) Provide the bases for your assertion (on pp. 45-46 of your April 5 contentions) that the emergency plan's initiating procedures must include the postulated accidents in the FSAR and Emergency Plan.

20(e) On page 46 of your April 5 contentions, you state: "The Environmental Plan should state the bases for selecting a certain emergency action level." Give the bases and explanation for requiring the Environmental Plan to state the bases for selecting a certain emergency action level.

20(f) State the bases and explanation for requiring that the responsibilities of the Unit Shift Supervisor and the Shift Superintendent relating to Emergency Implementing Procedure be more clearly delineated and the steps necessary to reach the correct level of delineation. Compare your answer with existing NRC requirements.

20(g) State in detail: (1) how the Applicant's Emergency Plan fails to meet the provision for the adequate, continued staffing required by 10 C.F.R. 50.47(b)(2) and NUREG-0654, Table B-1; (2) the bases and explanation for this assertion; and (3) how New Hampshire believes this alleged deficiency should be corrected.

20(h) State how the Emergency Plan fails to meet the provision of NUREG-0654, Criteria J.7, page 30 and the steps that should be taken to correct this deficiency.

20(i) State in detail: (1) how the notification process outlined in Section 3 of the Applicant's Emergency Plan will involve unnecessary delay in implementing protective actions; (2) the bases or reasons for this assertion, and (3) the corrective steps that you assert should be taken. Compare your answer with existing NRC requirements.

20(j) State the bases and reasons for asserting that the Emergency Plan fails to provide for prompt notification directly to all off-site authorities and describe how this alleged deficiency should be corrected. Compare your answer with existing NRC requirements.

20(k) List and describe in detail the steps that you feel must be taken by the Applicant in order to provide an adequate mechanism for making protective action recommendations, including the bases for making such recommendation, to the appropriate State and local authorities. Compare your answer with existing NRC requirements.

20(l) Provide the bases for the assertion that the emergency plan fails to satisfy the requirements of 10 C.F.R. 50.47(b)(7) and describe how the plan should be corrected in this regard.

20(m) Describe in detail the program that you believe should be adopted to acquaint the news media with the emergency plans and provide the bases therefor. Compare your answer with existing NRC requirements.

CONTENTION 21

Protective Action

The State contends that the Applicant's Emergency Plan does not demonstrate how, in case of an accident resulting in a site area or general emergency, the large numbers of people in the zone of danger may be protected or evacuated. Until there is reasonable assurance that adequate on-site and off-site protective measures can and will be taken, the Board should not issue an operating license.

Q.21(a) List in detail the provisions of the Applicants' Emergency Plan that you contend are inadequate and provide the bases and detailed explanation for each of these assertions.

21(b) State the steps that you feel must be taken to remedy the alleged deficiencies in the plan. Compare your answer with existing NRC requirements.

21(c) Provide the bases and detailed explanation for the assertion that the plan does not meet the requirements of 10 C.F.R. 50.47(b)(12) and describe what you contend must be done to rectify the situation.

21(d) Explain in detail why you believe the FSAR does not sufficiently demonstrate how injured personnel will be treated or the adequacy of medical services that have been arranged, and describe what you contend must be done to correct this alleged deficiency. Compare your answer with existing NRC requirements.

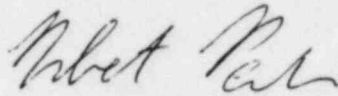
21(e) Do you contend that the Applicants have not demonstrated in their Emergency Plan that, in the event of an accident at the Seabrook facility, they will be able to protect individuals located on-site? If so, provide the bases and explanation for the assertion (including specific references to the Applicants' Plan) and describe the additional measures you contend are required. Compare your answer with existing NRC requirements.

21(f) List and explain: (1) any insufficiency of the plan in indicating upon what bases protective action decisions will be made and how protective actions will be implemented; (2) your bases or reasons for asserting there is an insufficiency; and (3) the steps that you believe must be taken to correct this insufficiency. Compare your answer to Subpart (3) with existing NRC requirements.

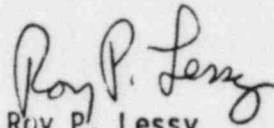
21(g) Do you contend that the plan does not comply with 10 C.F.R. 50.47(b)(10) and NUREG-0654? If so, state the bases and reasons for this

assertion and the means by which these alleged deficiencies may be satisfied.
Compare your answer with existing NRC requirements.

Respectfully submitted,



Robert G. Perlis
Counsel for NRC Staff



Roy P. Lessy
Deputy Assistant Chief
Hearing Counsel

Dated at Bethesda, Maryland
this day of November, 1982.

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NUCLEAR REGULATORY COMMISSION

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CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF'S INTERROGATORIES AND REQUESTS FOR DOCUMENT PRODUCTION TO THE STATE OF NEW HAMPSHIRE" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, or, as indicated by an asterisk, through deposit in the Nuclear Regulatory Commission's internal mail system, this 10th day of November, 1982:

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